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2006 MAR 13 P 12: 42

DISTRICT OF UTAH

BY: DEPUTY CLERK

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF UTAH

THE SCO GROUP, INC.

Plaintiff/Counterclaim-Defendant,

v.

INTERNATIONAL BUSINESS MACHINES CORPORATION,

Defendant/Counterclaim-Plaintiff.

STIPULATION AND JOINT MOTION TO SEAL CONFIDENTIAL DOCUMENTS

Civil No. 2:03CV0294 DAK

Honorable Dale A. Kimball

Magistrate Judge Brooke C. Wells

The parties, through their counsel of record, hereby stipulate and jointly move the Court for an Order sealing Exhibits 1 and 2 of Attachment A to the subpoena attached as Exhibit A to the Notice of Subpoena Duces Tecum re Houlihan Valuation Advisors, filed by International Business Machines Corporation ("IBM") on February 22, 2006 (Docket No. 631).

DATED this 9th day of March, 2006.

SNELL & WILMER L.L.P. Alan L. Sullivan Todd M. Shaughnessy Amy F. Sorenson

CRAVATH, SWAINE & MOORE Evan R. Chesler David R. Marriott

By /s/ Todd M. Shaughnessy
Counsel for Defendant International
Business Machines Corporation

DATED this 27th day of February, 2006.

HATCH, JAMES & DODGE, P.C. Brent O. Hatch Mark F. James

By /s/ Brent O. Hatch
Counsel for Plaintiff